

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**
Harrisburg Division

IN RE: JAMES MICHAEL LITTLE	Case No. 1:23-bk-02273-HWV Chapter 13
Freedom Mortgage Corporation, Movant	
vs.	
JAMES MICHAEL LITTLE, Debtor	

**OBJECTION TO CONFIRMATION
OF DEBTOR'S CHAPTER 13 PLAN**

Freedom Mortgage Corporation ("Movant"), by and through its undersigned counsel, files this *Objection to Confirmation of Debtor's Chapter 13 Plan* (Doc 13), and states as follows:

1. The Debtor filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on October 3, 2023.

2. Movant holds a security interest in the Debtor's real property located at 120 S LANDVALE ST, York Haven, PA 17370 (the "Property"), by virtue of a Mortgage which is recorded as instrument Number 2022022321 in Official Records of York County, Pennsylvania. Said Mortgage secures a Note in the amount of \$160,000.00.

3. The Debtor filed a Chapter 13 Plan (the "Plan") on October 27, 2023 (Doc 13).

4. The Plan includes payments toward the Note and Mortgage with Movant, however the figures used by the Debtor are inaccurate. Although Movant has not yet filed its proof of claim, it is anticipated that the claim will show the pre-petition arrearage due Movant is

\$24,567.18, whereas the Plan proposes to pay only \$21,978.00. Therefore, the Plan is not in compliance with the requirements of 11 U.S.C. §§ 1322(b)(3) and 1325(a)(5) and cannot be confirmed. Movant objects to any plan which proposes to pay it anything less than \$24,567.18 as the pre-petition arrearage over the life of the plan.

5. Movant objects to any plan which proposes to pay it anything less than \$24,567.18 as the pre-petition arrearage over the life of the plan.

WHEREFORE, Movant respectfully requests the entry of an Order which denies confirmation of the Plan unless such plan is amended to overcome the objections of Movant as stated herein, and for such other and further relief as the Court may deem just and proper.

/s/Mario Hanyon

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